

**CLOSED
SANITATION INC.
LICENSE NUMBER 291**

BARRY DAMSCHEN CONSULTING

**FALL 2003 GROUNDWATER MONITORING
EVENT "RAW DATA"**

NOVEMBER 2003

**IS LOCATED IN THE GROUNDWATER
MONITORING REPORTS ARCHIVE,
BOX NUMBER 2**

RECEIVED 11/6/2003



Hydrometrics, Inc.®

consulting scientists and engineers

MEMORANDUM

RECEIVED

DATE: September 19, 2003

OCT 21 2003

TO: Mr. Barry Damschen

FROM: Bob Anderson

BA

MONTANA
DEPT. OF ENVIRONMENTAL QUALITY
COMMUNITY SERVICES BUREAU

SUBJECT: Completion of Monitoring Well SIMW-4 at the Sanitation, Inc. Landfill

This memorandum summarizes the well drilling and construction activities conducted by Hydrometrics at the Sanitation, Inc. site near Lewistown, Montana. Project activities were conducted in accordance with the proposed scope of work included in my July 24, 2003 letter to you. One monitoring well was installed on August 27th, 2003 near the north permit boundary to augment the existing groundwater monitoring network. Hydrometrics (Bob Anderson) provided oversight during the drilling and well construction activities. Also present was Mr. Pat Crowley of the Montana Department of Environmental Quality Community Services Bureau.

The new monitoring well, designated SIMW-4, is located near the southeast corner of a storm water basin with the basin berm serving as the drill pad. The well site selection criteria include:

- Providing a groundwater monitoring point between existing wells SIMW-2 and SIMW-3;
- Providing a groundwater monitoring point between the north landfill waste boundary and the facility permit boundary; and
- Drill rig accessibility.

It was determined by all present that of all possible locations, the selected location best met these criteria. The well location is shown on Figure 1.

DRILLING ACTIVITIES

Drilling was completed by Sharp Drilling of Sidney using a direct air rotary drill rig and six-inch diameter tri-cone drill bit. Due to the consolidated nature of the subsurface sediments, drilling was completed open-holed without the need to drive casing. The hole was drilled to a total depth of 49.5 feet and the borehole diameter was approximately six inches. The target depth for drilling was the first water bearing zone.

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OCT 2 1 1963

U.S. DEPARTMENT OF AGRICULTURE
WASHINGTON, D.C. 20250

The subsurface lithology was recorded by logging drill cuttings at the surface. No water was added during drilling in order to maximize the quality of the drill cuttings, and to aid in identification of all water-bearing zones.

With the exception of the upper six feet, the subsurface lithology included alternating shale and sandstone layers, most likely of the Cretaceous age Kootenai Formation (and possibly the Colorado shale). The upper six feet consisted of clean earthen fill used to construct the storm water basin berm. The shale and sandstone units were mostly tan in color, with some red sandstone beds occurring between 20 and 40 feet. A blue-gray sandstone bed occurred between 41 and 42 feet below ground surface (bgs). The subsurface lithology is shown in the attached well log.

The drill cuttings were dry to a depth of 20 feet with some damp intervals occurring below that point. Saturated conditions (first water) was encountered at approximately 42 feet bgs. Upon completion of drilling, the borehole produced water at a rate of approximately one gallon per minute as determined by setting the drill stem set at 47 feet, waiting ten minutes, then blowing air through the drill stem. No indications of soil or groundwater contamination (i.e., odor, discoloration) were observed on any of the drill cuttings or the groundwater.

WELL COMPLETION

Following drilling, a monitoring well (SIMW-4) was completed in the borehole to a depth of 48.5 feet (see attached well log). Although drilling was completed to a total depth of 49.5 feet, the bottom foot of borehole caved in prior to well completion. The well was completed in accordance with State of Montana regulations (ARM 36.21.800) using two-inch diameter, schedule 40 flush-thread PVC casing and screen. Factory-slotted (0.010-inch) screen was placed from 48 feet to 43 feet bgs, with a six-inch well point attached to the screen bottom. Solid casing was added from the top of the screen to a height of 2.5 feet above ground surface. The borehole annulus (space between the well casing and borehole wall) was backfilled with 10/20 Colorado silica sand from 48.5 feet to 40.0 feet bgs to serve as a filter pack. The annulus was backfilled from 40 feet to 1.5 feet bgs with bentonite crumbles to seal the annulus. Wellhead completion included placing six-inch diameter protective steel casing with a locking lid around the PVC from three feet bgs to 2.8 feet above ground surface. A concrete pad was then poured around the well casing. Well completion details are included in the attached well log.

The well elevation was determined by completing a differential elevation survey from existing well SIMW-3. The elevation of the top of PVC casing, which will serve as the groundwater level measuring point, is 4,078.07 feet above mean sea level (amsl). Future static water level measurements can be subtracted from this value to determine actual groundwater elevations.

WELL DEVELOPMENT

After completion, the well was developed by hand bailing to remove sediment from within and around the well screen, and increase the degree of hydraulic connection between the well and the aquifer. A total of 25 gallons of water were removed from the well over the course of

1.5 hours using a disposable Teflon bailer. Initially the water was very turbid but cleared up significantly during development. The water turbidity remained relatively constant for the last ten gallons of bailing, indicating that additional bailing was not warranted. Upon completion of development, the bailed water was slightly turbid.

GROUNDWATER LEVEL DATA

At the time of well completion (prior to well development), the static water level in the well was 39.60 feet below the top of the PVC casing (BTOC), or 37.1 feet bgs. The water level dropped to 43.3 feet BTOC during development. The initial reading of 39.60 feet probably best represents static groundwater conditions, although this value may be artificially elevated due to the drilling and well completion activities. Based on a groundwater level of 39.60 feet BTOC (37.1 feet bgs), and the depth where water was first encountered during drilling (42 feet bgs), the groundwater is under some pressure indicating the aquifer is confined to semi-confined. Future groundwater level measurements should be used to verify static groundwater conditions at SIMW-4.

Based on the 39.60-foot measurement in SIMW-4, and static water level measurements recorded on the same day from other site monitoring wells and piezometers (Table 1), a potentiometric map was prepared depicting general groundwater flow directions (Figure 1). The groundwater elevation at SIMW-4 is lower than those recorded in the surrounding wells, resulting in a slight curvature, or depression, in the potentiometric surface. This depression coincides with the location of a topographic draw or drainage, indicating the potentiometric surface generally mimics the surface topography. This mimicking of surface topography is typical of most shallow groundwater systems.

**TABLE 1. AUGUST 27, 2003 STATIC WATER LEVEL MEASUREMENTS
AT THE SANITATION, INC. SITE**

Well	Static Water Level Feet	Measuring Point Elevation feet amsl	Groundwater Elevation feet amsl
SIMW-1	45.77	4,137.87	4,092.10
SIMW-2	35.70	4,123.71	4,088.01
SIMW-3	32.29	4,110.91	4,078.62
SIMW-4	39.60	4,078.07	4,038.47
SIP-1	35.08	4,120.24	4,085.16

amsl - above mean sea level

In summary, Hydrometrics provided oversight for drilling and construction of monitoring well SIMW-4 at the Sanitation Inc. site on August 27th, 2003. The well was completed to a total depth of 48.5 feet bgs, with the screen extending from 48 feet to 43 feet bgs and the sandpack extending from 48.5 feet to 40 feet bgs. Upon completion, the static water level was 39.60 feet BTOC and the well produced approximately one gpm. The depth of completion, static water level, and well yield are consistent with characteristics of other monitoring wells completed at the site. Based on the location and completion details, SIMW-4 should meet the objective of providing greater groundwater monitoring coverage at the site.



HYDROMETRICS INC.

Consulting Scientists and Engineers
Helena, Montana

Hole Name: SIMW-4

Date Hole Started: 8/27/03 Date Hole Finished: 8/27/03

Client: Barry Damschen Consulting

Project: Sanitation, Inc.

County: Fergus

State: Montana

Property Owner: Bill Spoja

Legal Description: Section 7, T15N, R19E

Descriptive Location: SE Corner of Sediment Basin

Recorded By: R. Anderson

Drilling Company: Sharp Drilling

Driller: John Sharp

Drilling Method: Direct Rotary

Drilling Fluids Used: Air

Purpose of Hole: Monitoring Well

Target Aquifer: First Water

Hole Diameter (in): 6 inches

Total Depth Drilled (ft): 49.5

WELL COMPLETION	Y/N	DESCRIPTION	INTERVAL
Well Installed?	Y	2-inch, flush threaded, Sch 40, PVC	+2.5 to 48.5 ft
Surface Casing Used?	Y	6-inch diameter steel	+2.8 to 3.0 ft
Screen/Perforations?	Y	0.010-inch slot, Sch 40, PVC	43 to 48 ft
Sand Pack?	Y	10/20 Colo. Silica Sand	40 to 49.5 ft
Annular Seal?	Y	Bentonite Crumbles	1.5 to 40 ft
Surface Seal?	Y	Concrete	0 to 1.5 ft

DEVELOPMENT/SAMPLING

Well Developed?	Y	Hand Bail
Water Samples Taken?	N	
Boring Samples Taken?	N	

Static Water Level Below MP: 39.60 ft

Date: 8/27/03

MP Description: Top of PVC Casing

MP Height Above or Below Ground (ft): 2.5 ft

Surface Casing Height (ft): 2.80

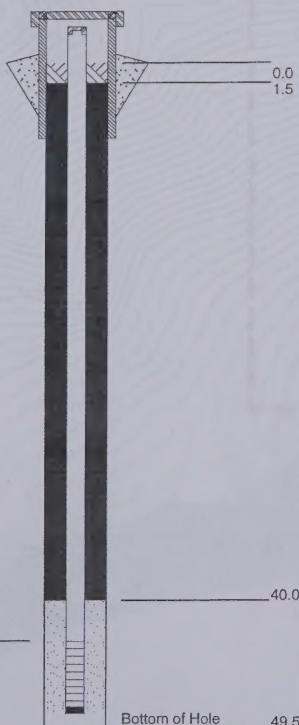
Riser Height (ft): 2.50

Ground Surface Elevation (ft): 4,075.5

MP Elevation (ft): 4078.07

Remarks: Well completed on SE corner of sediment basin berm. Made one to two gpm by blowing with rig.

WELL CONSTRUCTION



GRAPHICS

GEOLOGICAL DESCRIPTION

0.0 - 6.0'

Silty Sand and Gravel

Tan silty, gravelly sand. Dry. Low cohesion. Fill.

6.0 - 10.0'

Clay

Gray silty clay, stiff. Moderately calcareous. Dry. Probable shale bed.

10.0 - 13.0'

Shale

Yellowish tan silty fine sand. Well sorted. Non-calcareous. Dry. 70% rounded to subrounded fine sand, 30% silt. Poorly indurated, soft, easy drilling.

13.0 - 16.0'

Sandstone

Tan to light brown fine sand. Well sorted. Non-calcareous. Dry. 90+% fine subrounded sand. Moderately indurated. Harder drilling than above.

16.0 - 19.0'

Sandstone

Light brown fine sand. Very well sorted. Non-calcareous. Dry. Moderately indurated. Similar drilling as 13 to 16 feet.

19.0 - 40.0'

Sandstone with Shale Beds

Reddish silty fine sand alternating with tan silty shale beds. Overall 80% sandstone/20% shale throughout interval. Damp at 20 feet. Non-calcareous. Sandstone with interbedded shale beds.

40.0 - 41.0'

Sandstone

Yellow-tan silty fine sand. Well sorted. Non-calcareous. 70% rounded to subrounded fine sand, 30% silt. Moderately indurated.

41.0 - 42.0'

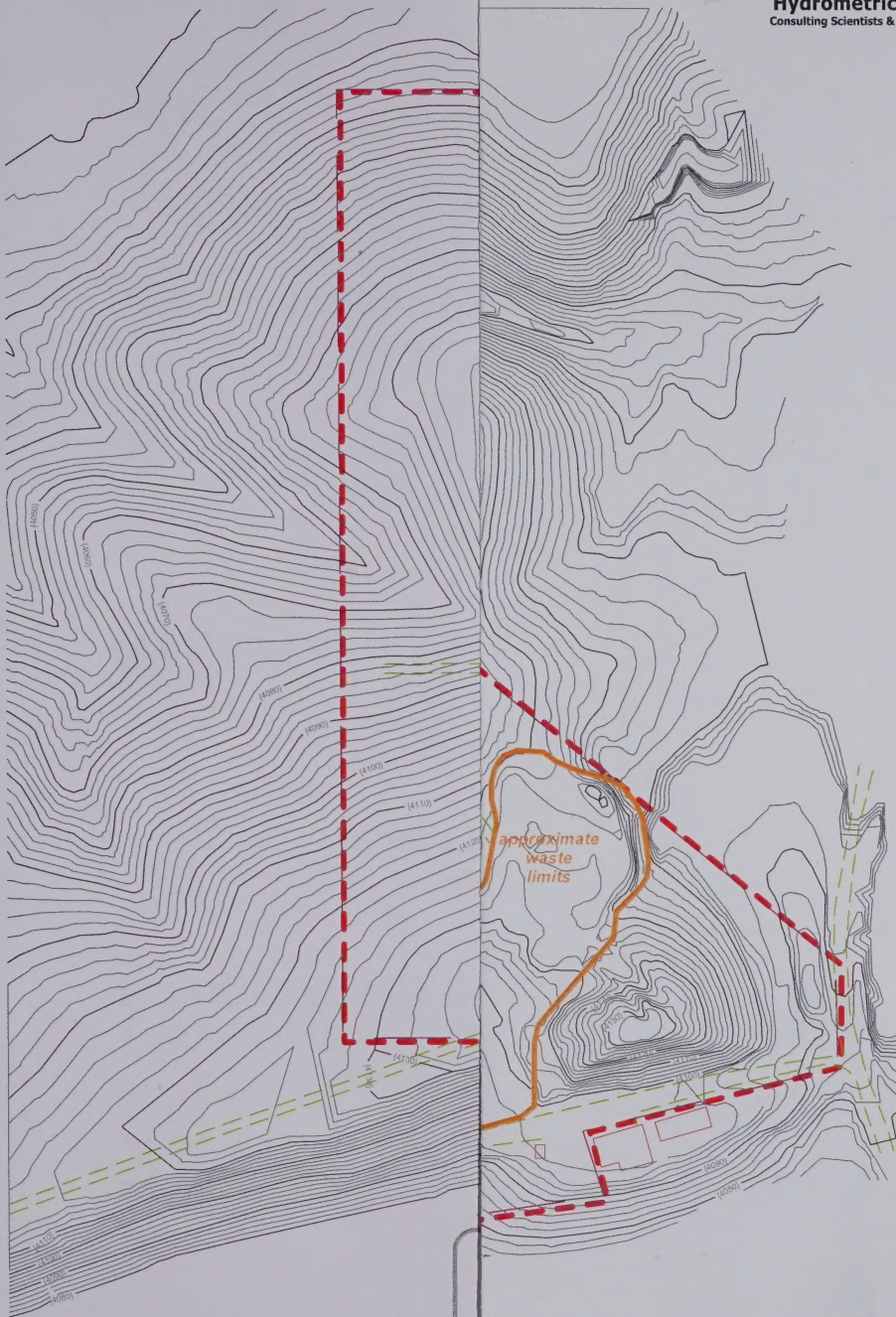
Sandstone

Blue-gray fine silty sand (sandstone). Well sorted. Non-calcareous. Moist, poorly indurated. Distinctive metallic-blue color. Saturated at 42 feet.

42.0 - 49.5'

Sandstone

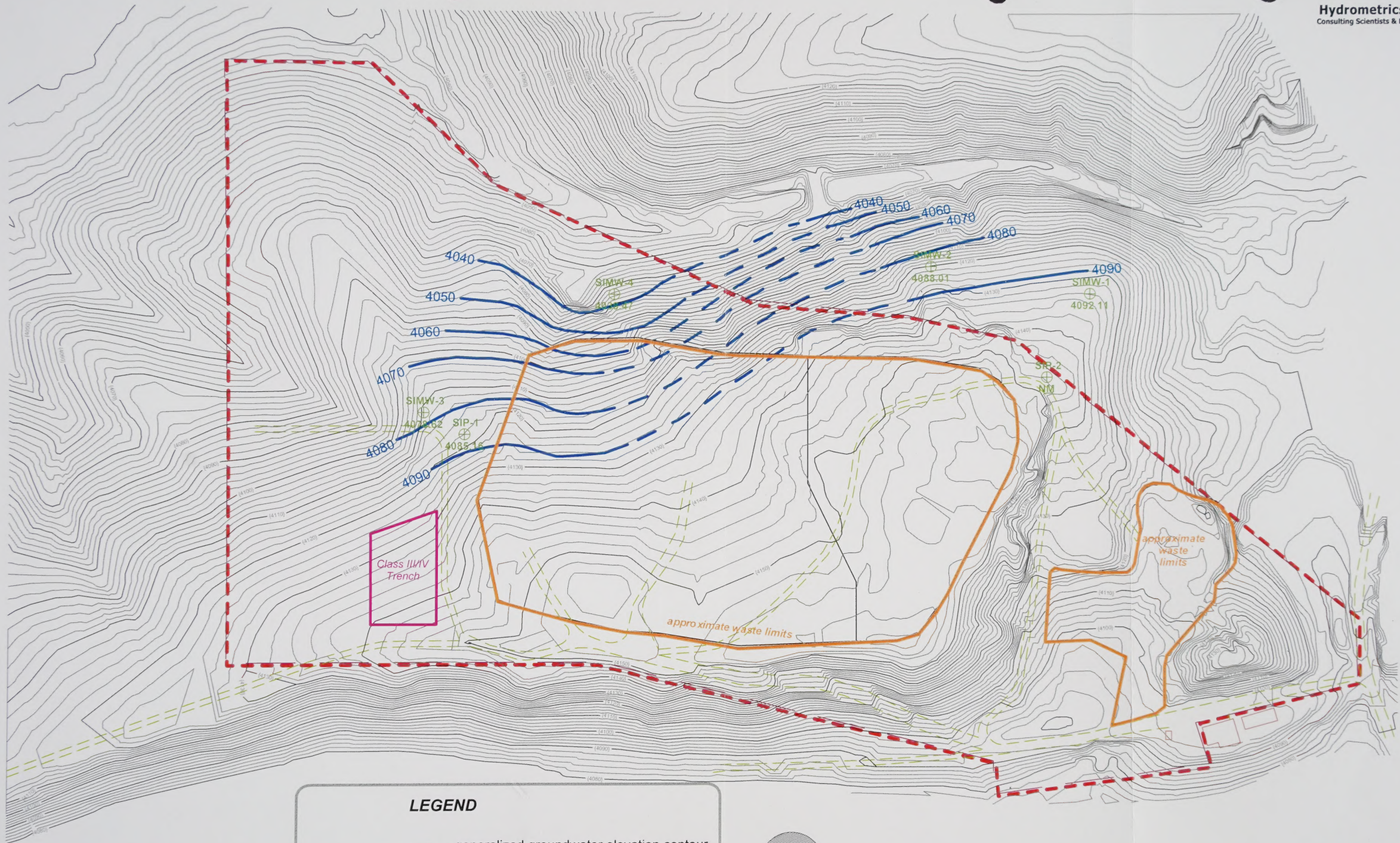
Varying tan/red-brown very fine silty sand (sandstone). Well sorted. Non-calcareous. Saturated. Moderately indurated. Thin tan shale bed 47 to 47.5 feet. Bottomed out at 48.5 feet in red-brown fine sandstone.



Groundwater Elevations and
Potentiometric Contours
Hydrometrics, Inc. Landfill
Bozeman, Montana

FIGURE

1



LEGEND

4080 ————— generalized groundwater elevation contour (dashed where inferred)

SIMW-3
⊕
4078.62 well/piezometer location with August 27, 2003 groundwater elevation

NORTH

0 200 400
Scale (ft)

August 27, 2003 Groundwater Elevations and Generalized Potentiometric Contours
Sanitation, Inc. Landfill
Lewistown, Montana

FIGURE
1

**CLOSED
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**BARRY DAMSCHEN CONSULTING /
HYDROMETRICS**

**FALL 2002 GROUNDWATER SAMPLING
REPORT**

JANUARY 2003

**IS LOCATED IN THE GROUNDWATER
MONITORING REPORTS ARCHIVE,
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RECEIVED 1/22/2003

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**JULY 2003 GROUNDWATER SAMPLING
REPORT**

OCTOBER 2003

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**OCTOBER 2003 GROUNDWATER SAMPLING
REPORT**

DECEMBER 2003

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**OCTOBER 2004 GROUNDWATER SAMPLING
REPORT**

JANUARY 2005

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CLASS
SCHEDULE
ALL TIME NUMBER 101

MARKET GARDENERS' CO-OPERATIVE
SYNOPSIS

ON THE 20th OF FEBRUARY 1911
REPORT

JANUARY 1911

IN LIAISON WITH THE
MARKET GARDENERS' CO-OPERATIVE
SYNOPSIS

RECEIVED

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**BARRY DAMSCHEN CONSULTING /
HYDROMETRICS**

**JUNE 2004 GROUNDWATER SAMPLING
REPORT**

SEPTEMBER 2004

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EXHIBIT
APPENDIX
LICENSE NUMBER 101

BARBARA D. LAMCHIN & CONSULTING
HYDROLOGISTS

JOINT BOB CROW / JOINT SAMUELSON
REPORT

SEPTEMBER 1984

PREPARED BY THE UNIVERSITY OF
WASHINGTON, WASHINGTON
BOX 355000

UNIVERSITY OF WASHINGTON

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SANITATION INC.
LICENSE NUMBER 291**

**UGRIN, ALEXANDER, ZADICK & HIGGINS,
P.C.**

**JUNE 2004 LABORATORY ANALYTICAL
REPORTS**

AUGUST 2004

**IS LOCATED IN THE GROUNDWATER
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RECEIVED 8/4/2004

This is the
original copy
that he sent me.

closed S.F

Ferguson
Sair Inc

Property & #
Census
Finan Assur
GW Con Meas
GW Monitoring
Ovr Reports
Inspections
Other

Landfarm
Liner
Methane
O & M
Run - On



Montana Department of
ENVIRONMENTAL QUALITY

Judy Martz, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • Website: www.deq.state.mt.us

Legal Unit

Direct Line: (406) 444-1422

Telefax Line: (406) 444-4386

December 16, 2004

Barry E. Damschen, P.E.
Barry Damschen Consulting, LLC
5531 York Road
Helena MT 59602

Re: Sanitation Inc. Landfill
(License # 291).

Dear Mr. Damschen:

This will confirm the Department of Environmental Quality's (Department) receipt of the copy of the fully executed final Chain of Custody Record that you sent under cover of letter dated December 13, 2004. This will acknowledge that the Solid Waste Section of the Department shall replace the previously submitted unsigned record form with the copy of the signed form you have submitted. Please don't hesitate to contact me if you have any further questions regarding this matter.

Sincerely,

Keith A. Christie
Staff Attorney
Department of Environmental Quality

cc: Tim Stepp
Autumn Bahr
(ENFD)

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DEC 17 2004

Dept. of Enviro. Quality
Waste & Underground
Tank Management Bureau

THE UNIVERSITY OF CHICAGO

CHICAGO, ILL.

1911

1911

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CHICAGO, ILL.
1911

Perkins
Library



Chain of Custody and Analytical Request Record

Page ____ of ____

PLEASE PRINT, provide as much information as possible. Refer to corresponding notes on reverse side.

Company Name: Energy Laboratories		Project Name, PWS#, Permit #, etc.: Sanitation Inc. Landfill	
Report Mail Address: 553 York Road Hingham, MA 01942		Contact Name, Phone, Fax, Email: Barry Damichon 461-5003	
Invoice Address: Bill Stojan Sanitation Inc. Box 800 Hingham, MA 01942		Purchase Order #: 538-8767	
Report Required For: POTWWTP ☐ DW ☐ Other ☐ Sanitation Inc. Waste		Notify ELJ prior to RUSH sample submittal for additional charges and scheduling	
Special Report Formats - ELJ must be notified prior to sample submittal for the following: NELAC ☐ AZLA ☐ Level IV ☐ Other _____		Comments: SEE ATTACHED	
EDD/EDT ☐ Format _____		Receipt Temp 4 deg °C Cooler ID(s) _____	
SAMPLE IDENTIFICATION (Name, Location, Interval, etc.)		Custody Seal Ink ☐ N Signature ☐ N Match ☐ N Lab ID	
1 Simw-1		LABORATORY USE ONLY	
2 Simw-2			
3 Simw-3			
4 Simw-4			
5 Simw-4D			
6 Trip Blank			
7			
8			
9			
10			
Requested by: Barry Damichon		Received by: Steve Pajda	
Requisitioned by: Barry Damichon		Requisitioned by: Barry Damichon	
Date/Time: 6-22-04 2:30		Date/Time: 6/22/04 2:30	
Sample Disposal: Return to client		Sample Type: LABORATORY USE ONLY	
Signed Barry Damichon		Signed Steve Pajda	

In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This serves as notice of this possibility. All sub-contract data will be clearly noted on your analytical report.

Visit our web site at www.energylab.com for additional information, downloadable fee schedule, forms, & links.

BARRY DAMSCHEN CONSULTING, LLC

Engineering • Solid Waste Management • Grant Administration

December 13, 2004

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DEC 15 2004

Keith A. Christie
Staff Attorney
Department of Environmental Quality
P.O. Box 200901
Helena, MT 59620-0901

Dept. of Enviro. Quality
Waste & Underground
Tank Management Bureau

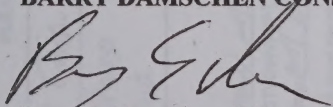
Dear Mr. Christie:

I am in receipt of your December 10, 2004 letter to Neil Ugrin concerning the report that was prepared for the June 21, 2004 groundwater sampling event for the Sanitation Inc. Landfill. I reviewed the report that was sent to your office and noticed that the Chain-Of-Custody Record (COCR) that was included in the report was a copy of the draft COCR that I prepared before I delivered the samples to UPS in Malta on June 22. Today I had Energy Labs fax me a copy of the final COCR which has all of the information that you indicated was missing in your letter. I would appreciate it if you would replace the draft COCR with this copy in your files. I would also greatly appreciate it if you could send me written verification that this situation has been corrected.

I hope that originally submitting the draft COCR has not caused any inconvenience. I apologize if it has and promise that this oversight will not take place in the future. Thank you.

Very truly yours,

BARRY DAMSCHEN CONSULTING, LLC



Barry E. Damschen, P.E.
Project Manager

Enclosure

cc: Neil Ugrin
Tim Stepp
Mark Walker

Chain of Custody and Analytical Request Record

Page ____ of ____

PLEASE PRINT, provide as much information as possible. Refer to corresponding notes on reverse side.

Company Name: Barn Damichan Corp. Hwy		Project Name, PWS #, Permit #, Etc.: Saverton Trc. Landfill	
Report Mail Address: 5530 York Road Falmouth, ME 04102		Contact Name, Phone, Fax, Email: Barn Damichan 461-5003	
Invoice Address: Bill Spolva Saverton Trc. P.O. Box 883 Falmouth, ME 04102		Purchase Order #: 538-8767	
Report Required For: POTW/WTP ☐ DW ☐ Other ☐ Landfill		Notify ELI prior to RUSH sample submittal for additional charges and scheduling Comments:	
Special Report Formats - ELI must be notified prior to sample submittal for the following: NELAC ☐ A2LA ☐ Level IV ☐ Other _____		Receipt Temp Cooler ID(s)	
EDD/EDT ☐ Formal		Custody Seal ☐ N Inlet ☐ N Signature Match ☐ N	
SAMPLE IDENTIFICATION (Name, Location, Interval, etc.)		RUSH Turnaround (TAT)	
Collection Date		Normal Turnaround (TAT)	
Collection Time		Lab ID	
MATRIX		LABORATORY USE ONLY	
1 SPW-1		6-21-04 1215	
2 SPW-2		6-21-04 1400	
3 SPW-3		6-21-04 1500	
4 SPW-4		6-21-04 1600	
5 SPW-4D		6-21-04 1600	
6 Trip Blank		6-21-04	
7			
8			
9			
10			
Shipped by: Barn Damichan		Received by: Spolva	
Date/Time: 6-22-04 3:30		Date/Time: 6/22/04 2:30	
Relinquished by:		Received by: Spolva	
Sample Disposal:		Date/Time: 6/22/04 2:30	
Return to client:		Date/Time: 6/22/04 2:30	
In certain circumstances, samples submitted to Energy Laboratories, Inc. may be subcontracted to other certified laboratories in order to complete the analysis requested. This service as notice of this possibility. All sub-contract data will be clearly notated on your analytical report.		LABORATORY USE ONLY	
Signed		Sample Type: ELI	
Custody Record Must be Signed		# of fractions	



Montana Department of
ENVIRONMENTAL QUALITY

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Legal Unit

Tel: (406) 444-1422

Fax: (406) 444-4386

December 10, 2004

Neil E. Ugrin, Esq.

Ugrin, Alexander, Zadick & Higgins, P.C.

#2 Railroad Square, Suite B

PO Box 1746

Great Falls, MT 59403-1746

RE: GROUND WATER DETECTION MONITORING REPORT

Sanitation Inc. Class II Landfill (Lic. #291)

Dear Neil:

On September 8, 2004, the Department received the Groundwater Monitoring Report from the June 21, 2004, ground water sampling of the Sanitation Inc. Class II landfill monitoring wells.

As we discussed in our telephone conversation of December 8, 2004, the Department has reviewed the report and concurs with the conclusion that VOC contaminants were not present at detectable levels in the monitoring network at the time of sampling. Further, increases in nitrate-plus-nitrite levels at the new monitoring well (SMW-4) might be attributed to fertilization of the final cover last fall.

Please note, however, that due to the unsigned chain-of-custody releases, results from this sampling event could be invalidated. It is further noted that the time of receipt by the laboratory is absent. It is important that chain-of-custody procedures be followed in future sampling submissions to the Department, where applicable.

Please don't hesitate to contact me if you have any questions regarding this matter.

Sincerely,

Keith A. Christie

Staff Attorney

Department of Environmental Quality

Cc: Tim Stepp, DEQ Solid Waste Program
Barry Damschen, Damschen Consulting
Mark Walker, Hydrometrics

File: Lic. # 291 Fergus Co/Sanitation Inc class II/Ground Water Monitoring... and .../Legal

Path: G:\WUTS w s\enforcement\ClassII\sanitationInc\sanInc_GWmonit0804.doc



Montana Department of
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MAILED

9-13-04 fh

Judy Martz, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.state.mt.us

September 13, 2004

Mr. William Spoja
Sanitation Inc.
P.O. Box 882
Lewistown, MT 59457-0882

RE: Groundwater Monitoring Report, Sanitation Inc. Landfill, License Number 291

Dear Bill:

The Solid Waste Program received the Spring Groundwater Monitoring Report on September 8, 2004. It was assigned to Patricia Potts for review. I anticipate that you will receive a response from Ms. Potts within 90 days.

If you have any questions on the review status or the results, please contact Ms. Potts directly at 406-444-0538, or by email at ppotts@state.mt.us. If you have any other issues or questions, please contact me at 406-444-5345, or at rithompson@state.mt.us.

Sincerely

Rick Thompson, Supervisor
Waste Management Section
Waste and Underground Tank Management Bureau

MAILED

Montana Department of
ENVIRONMENTAL QUALITY



September 12, 2004

Mr. William J. Gage
Executive Director
P.O. Box 207
Bozeman, MT 59702-0207

Re: Environmental Monitoring Agency (EMA) for the Montana Department of Environmental Quality

Dear Sir:

The State of Montana has received the Environmental Monitoring Agency (EMA) for the Montana Department of Environmental Quality. I am pleased to inform you that the EMA will receive a response from the State of Montana on or before September 15, 2004.

It is requested that you provide the State of Montana with the information requested in the attached letter. If you have any questions or concerns, please contact me at 406-455-1234 or by email at [redacted].

Sincerely,

Executive Director
Montana Department of Environmental Quality
Bozeman, Montana 59702-0207



Montana Department of
ENVIRONMENTAL QUALITY

MAILED
8-16-04 *SM*

Judy Martz, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.state.mt.us

August 24, 2004

CERTIFIED MAIL

7003 1010 0004 1869 1548

Mr. Neil Ugrin, Esq.
Ugrin et al., Attorneys
#2 Railroad Square, P.O. Box 1746
Great Falls, MT 59403-1746

**RE: EVALUATION & REPORTS—GROUND WATER DETECTION MONITORING
Sanitation Inc. Class II Landfill (Lic. #291)**

Dear Mr. Ugrin:

On August 4, 2004, the Department received your laboratory analytical reports from the June 22, 2004, ground water sampling of the Sanitation Inc. Class II landfill monitoring wells, and has found several deficiencies relative to what is required.

Sanitation Inc. has submitted raw analytical data for Table I parameters without evaluation and reporting by a qualified ground-water hydrogeologist. As before, the required detection monitoring report must arrive within 90 days of sampling and the Department will only evaluate and comment on data upon submittal of the report. Such a ground-water detection monitoring report [ARM 17.50.708] must include specific information on: (i) acquisition field notes, (ii) water levels and a potentiometric contour map, and (iii) statistical analysis and discussion of any parameter variations relative to background. Even though the raw data indicate no detection of VOCs at this time, the validity of the data cannot be verified without submittal of the required detection monitoring report.

In review of our discussion on previous requests, the Department cannot respond to your requests for reduction in ground-water monitoring until: (1) semi-annual sampling is conducted in an approved and timely manner and submitted with reports; (2) all sample analyses meet the nondetect requirements specified in previous letters; (3) Sanitation Inc. submits the required written justification authored by a qualified ground-water hydrogeologist; and (4) adequate post-closure financial assurance is established and overall compliance is achieved at the facility.

If you have any questions or comments, please contact me at the Permitting and Compliance Division, Waste & Underground Tank Management Bureau, Waste Management Section: Voice (406) 444-4475, email tstepp@state.mt.us or FAX (406) 444-1374.

Sincerely,

Tim Stepp
Solid Waste Program

Cc: Keith Christy, DEQ Legal Unit
File: Lic. # 291 Fergus Co/Sanitation Inc class II/Ground Water Monitoring... and .../Legal
Path: G:\WUTS w s/enforcement/Class II/sanitation Inc/sanInc_GWmonit0804.doc

County Fergus
Facility & # San Inc
Closure
Finan Assur
GW Corr Meas
GW Monitoring
GW Reports
Inspections
Other: _____

Landfarm
Liner
Methane
O & M
Run - On

Notes by J.P. Crowley

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8/27 Sanitation Line

SWL = -35.08

SIMW-1

MFL 5161 47° 04.489 N

109° 22.664 E

47° 04.462' N
109° 22.346' E

P120. 5191 4146 178' EPE

5161 4185 191' EPE
SWL = 45.77

CO2 = 3.89 CH2 = 0 02 16.5

SIMW-3 SWL = -32.29 N

47° 04.503

SIMW-2

109° 22.683

Elev 4141 22' EPE

47. 04.488 N
109. 22.418 E

5162 47° 04.389 N

109° 22.614

SWL 85.70 13' EPE
EL 4170

109° 22.614

51 41 141' EPE

CO2 6.10 02 15.1 CH4 = 0

516-3 47 04.302 N
109 22.369 E

516-4 5192 47° 04.440 N

109° 22.380'

EL 4143 16' EPE
CO2 20.3 02 0 CH4 1.44

E1 = 4184 141' EPE

CO2 .90 02 20.5 CH4 0

M10 = 51.39 SWL

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Notes by F.P. Crowley

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Sanitation Inc 8/27/03

Drill MW 4

Loc 47° 04.514' N

1090 22.573 E

EL 405 EPE 12'

Water @ 42-45'

Screen - 5' 42-42

ID - 48

Gravel 48-47 and 47-40

Reconite To Top.

Drilled in Cretaceous ss w/ minor

shale beds.

